

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
SELMA DIVISION**

IN RE: Bobby Harvell
Debtor(s)

Chapter 13 Case No. 09-12859

MOTION TO EXTEND TIME TO COMPLETE CHAPTER 13 PLAN

COMES NOW the Debtor(s), by and through attorney, and hereby moves this Court to grant the motion to extend the time to complete the Chapter 13 plan and as grounds for said Motion, would state as follows:

1. The Debtor(s) have a limited income and needs the additional time to complete the Chapter 13 plan.
2. The debtor(s) proposes to pay \$604.50 per month to the trustee for a period of 60 months, as this is the most he can afford to pay.

WHEREFORE, the premises considered, the Debtor(s) requests the court to extend the time to complete the Chapter 13 plan.

Respectfully submitted this 13th day of July, 2009.

/s/ Richard D. Shinbaum
Richard D. Shinbaum
Attorney for the Debtor

Of Counsel:
SHINBAUM, MCLEOD & CAMPBELL
P.O. Box 201
Montgomery, Alabama 36101
(334) 269-4440
(334) 263-4096 Fax

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the above foregoing Motion on all parties listed below by mailing a copy of the same to them on this day: August 18, 2009

John C. McAleer, III
Chapter 13 Trustee
P.O. Box 1884
Mobile, AL 36633

/s/ Richard D. Shinbaum
Richard D. Shinbaum